

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

MEDAPATI REDDY	)	
	)	
	)	Civil Action No. 08 CV 321
	)	
v.	)	Judge Holderman
	)	
UBS AG	)	
	)	
	)	Magistrate Judge Ashman
	)	
Defendant.	)	

**DEFENDANT'S AGREED MOTION  
FOR ENTRY OF AGREED PROTECTIVE ORDER**

Pursuant to Federal Rule of Civil Procedure 26(c) and the stipulation of the parties with respect to the confidentiality of certain records produced by Defendant in the course of this litigation, Defendant moves for entry of an Agreed Protective Order. In support of its motion, Defendant states:

1. Pursuant to Federal Rule of Civil Procedure 26(c), Defendant has agreed to make available to Plaintiff's counsel for inspection and copying, business records, personnel information, information relating to methods of operation and technology, information regarding contractors and other proprietary and confidential documents of Defendant (the "Confidential Information"). This information includes, but is not limited to, documents which may reveal employee performance, salary, benefits, residential and/or other information of a personal nature; Defendant's business operations, technology and finances and internal documents regarding Defendant's employees and contractors.. Plaintiff agrees to the entry of this Agreed Protective Order governing production of the Confidential Information.

2. On June 9, 2008, Defendant's counsel prepared and delivered a proposed

protective order for review by Plaintiff. On June 10, 2008, Plaintiff signed the proposed protective order and returned it to Defendant's counsel. A copy of the proposed agreed protective order has been submitted pursuant to the Court's Standing Order on Submitting a Proposed Order, Agreed or Otherwise, for Electronic Entry by the Judge.

3. Good cause exists for the issuance of the proposed agreed protective order because of the reasonable expectations of Defendant, its current and former employees, and Defendant's contractors and their employees that the Confidential Information will not be publicly disseminated.

WHEREFORE, Defendant respectfully requests that this Court sign and enter the agreed protective order already executed by the parties.

Respectfully submitted,

UBS AG

By: /s/ Kyle A. Petersen  
One of Its Attorneys

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**CERTIFICATE OF SERVICE**

Kyle A. Petersen., one of Defendant's attorneys, certifies that on June 12, 2008, she electronically filed the foregoing ***Defendant's Agreed Motion for Entry of Agreed Protective Order*** with the Clerk of the court using the CM/ECF system which will send notification of such filing to the following:

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/s/Kyle A. Petersen